

STONE MAGNANINI

COMPLEX LITIGATION

July 28, 2022

VIA CM/ECF

Hon. Vincent L. Briccetti
United States District Judge
United States Courthouse
300 Quarropas Street, Room 630
White Plains, NY 10601

Re: *Hayden v. IBM, et al.*,
Case No. 7:21-cv-02485-VB

Dear Judge Briccetti:

We represent Plaintiff Gerald W. Hayden in this matter. We write with Defendants' consent requesting permission to adjust certain discovery deadlines set by the Court's Revised Scheduling Order (Dkt. 34).

As the Court is aware, the Court has scheduled a conference on August 25 at 2:30 pm to consider Defendants' request to move for summary judgment and Plaintiff's request to compel discovery (Dkt. 35, 38). Because certain discovery deadlines are currently scheduled to occur prior to the date of that conference, we write to request a modification of the Court's schedule until after the Court has an opportunity to address the matters raised in the parties' applications and, based on the Court's rulings, the parties and the Court can determine what additional time is necessary to complete discovery. With this background, the parties request the following adjusted schedule, subject to Your Honor's approval, pending the Court's August 25, 2022 conference:

Fact-discovery end date:	currently July 29, changes to August 29
Non-Expert Depositions:	currently July 29, changes to August 29
Plaintiff's expert reports:	currently August 29, changes to September 29
Defendants' expert reports:	currently October 10, changes to November 10
Discovery end date:	currently October 27, changes to November 27

Pursuant to Your Honor's Individual Practices, a proposed Revised Civil Case Discovery Plan and Scheduling Order is attached. Thank you for the Court's consideration of this matter.

Respectfully submitted,

/s/ Robert A. Magnanini
Robert A. Magnanini

cc: Counsel of Record (via CM/ECF)